

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CITY OF ALMATY, KAZAKHSTAN and BTA  
BANK JSC,

Plaintiffs,

-against-

MUKHTAR ABLYAZOV, VIKTOR  
KRAPUNOV, ILYAS KHRAPUNOV, and  
TRIADOU SPV S.A.,

Defendants.

No. 15-CV-05345(AJN)

**DECLARATION OF MATTIAS  
AGGELER**

I, MATTIAS AGGELER, hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

1. I am an informational technology (“IT”) forensics partner at Swiss Forensic Technology Solutions, an international consulting firm that specializes in IT forensics, electronic discovery and information governance.
2. I was retained by Hoguet Newman Regal & Kenney LLP to, among other things, cull, collect, ingest and analyze electronically stored information from multiple email accounts and electronic devices belonging to Ilyas Khrapunov.
3. Among the email accounts that I reviewed was [yodamaster@cryptoheaven.com](mailto:yodamaster@cryptoheaven.com).
4. I ran searches for any instance of the final version of the deposition transcript of Kenges Rakishev (the “Final Transcript”) in all of Ilyas Khrapunov’s secured email accounts.
5. The search produced only one result; the Final Transcript was received as an attachment by [yodamaster@cryptoheaven.com](mailto:yodamaster@cryptoheaven.com) from [aangel@hnrlaw.com](mailto:aangel@hnrlaw.com) on 18 October 2017 under file name: “Rakishev Kenes (Confidential) 10.11.17.pdf.”
6. There were no duplicates or near duplicates of this file in any email account or device reviewed, including the outbox or sent items folder of [yodamaster@cryptoheaven.com](mailto:yodamaster@cryptoheaven.com).

7. One item with medium similarity was found. The file, titled "rough1011.txt" was received by yodamaster@cryptoheaven.com from jcurley@hnrlaw.com on 12 October 2017.
8. There were no duplicates of the "rough1011.txt" file in any email account, including the outbox or sent items folder of yodamaster@cryptoheaven.com.
9. It is my professional opinion based on my forensic review of the email accounts and electronic devices belonging to Ilyas Khrapunov that he received the Final Transcript on 18 October 2017 and there is no indication that the file was sent or transmitted to anyone else.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 15, 2017



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MATTIAS AGGELER